

EXHIBIT E

Subject: Recap of Today's Weekly OEM Discovery Call

From: owner-oem_subpoenas@lists.susmangodfrey.com [mailto:owner-oem_subpoenas@lists.susmangodfrey.com] **On Behalf Of** Ronnie Spiegel

Sent: Friday, March 16, 2018 5:05 PM

To: 'OEM_subpoenas@lists.susmangodfrey.com' <OEM_subpoenas@lists.susmangodfrey.com>

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Counsel,

To help us all keep track of all the moving pieces, here is a quick summary of status and items due for each OEM, and other cost and scheduling items. The point person for each OEM is also listed for your reference.

- 1) FCA (Sheldon Klein)
 - a. FCA provided list of upstream suppliers. Parties need to get back to FCA with our choices. The Parties will get back to each other by Tuesday, 3/20, with their respective choices.
 - b. Parties need to get back to GM with the list of suppliers and then draft letter to GM re production schedule and expectation that production go quickly.
- 2) GM (Floyd Short)
 - a. Floyd short working on terms of stip with GM counsel. Stip needs to be finalized.
 - b. Parties need to review GM commodity codes list and figure out which ones pertain to OSS, and then give the collective agreed list back to GM counsel.
- 3) Honda (Evelyn Li)
 - a. We had a call with Honda counsel. Honda counsel was checking on whether OSS production can be accomplished and on what timeline. Honda counsel asked if the parties could put in writing exactly the items we are seeking at this stage (which is just what is in the Honda Order). Parties sent Honda counsel a letter, and it is pending.
- 4) Nissan (Will Reiss)
 - a. Parties had a call with Nissan counsel (Paul Cauley) on 3/16. Parties relayed the message that we are now seeking OSS. Paul said he would check with Nissan to get the status re how long it might take to prepare production for OSS-specific categories. Next call was set for 3/29 to follow up.
- 5) SIA (Lucas Isacharoff)
 - a. The Parties had a call with SIA counsel, and Kim Metzger is checking on agreement to produce OSS, and a potential timeline.
- 6) SOA (Lucas Isacharoff)
 - a. Finalizing letter re expert handling of SOA data. Defendants will get back re their potential edits to current draft in the next few days.
 - b. Costs must be paid before SOA will produce.
 - c. Parties need to let Neal Walters know if they want a masked set of data prepared for attorneys to view.
- 7) Toyota (Will Reiss)
 - a. The Parties had a call with Toyota counsel. Toyota is checking on conversion to OSS and timeline. Parties sent a letter to Toyota asking for a commitment to produce, and to set a schedule in quick order. Waiting to hear back from Mike Schaper.
- 8) Costs

- a. EPPs will draft and circulate potential cost-sharing agreement between the Parties. Other Parties will review and edit re the 70% split of production costs.
- 9) Setting Production Schedule with Each OEM – Letter to each OEM
 - a. Each OEM group should draft letter to be sent to each OEM, to tie up any issues and to push for a production schedule in writing.

Best,
Ronne

Ronnie Spiegel | Partner
Hagens Berman Sobol Shapiro LLP
1918 8th Ave. Ste. #3300 - Seattle, WA 98101
Direct: (206) 268-9343
ronnie@hbsslaw.com | www.hbsslaw.com | [HBSS Blog](#)



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